

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, et al.,  
Debtors.<sup>1</sup>

: PROMESA  
: Title III  
: Case No. 17-BK-3283 (LTS)  
: (Jointly Administered)  
:  
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**CERTIFICATE OF NO OBJECTION REGARDING APPLICATION  
FOR ORDER PURSUANT TO BANKRUPTCY CODE SECTION 1103(A)  
AND LOCAL BANKRUPTCY RULE 2014-1(e) AUTHORIZING  
EMPLOYMENT AND RETENTION OF CONTINENTAL PLLC  
AS SUBSTITUTE SPECIAL LITIGATION COUNSEL TO  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
EFFECTIVE AS OF FEBRUARY 14, 2022**

On February 28, 2022, Continental PLLC and its attorneys John Arrastia, Jesus Suarez, and Angelo Castaldi, the proposed substitute special litigation counsel for the Official Committee of Unsecured Creditors (the “Committee”),<sup>2</sup> filed an *Application for Order Pursuant to Bankruptcy Code Section 1103(A) and Local Bankruptcy Rule 2014-1(E) Authorizing Employment and*

<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

*Retention Of Continental PLLC as Substitute Special Litigation Counsel to Official Committee Of Unsecured Creditors, Effective as of February 14, 2022* (the “Application”) (DE 20222), together with a notice of hearing (“Hearing Notice”).

The Hearing Notice stated that a hearing on the Application would take place on March 23, 2022 at 9:30 a.m. (AST) (“the Hearing”) or at such other place and time as ordered by the Court. Objections to the Application were to be filed and served no later than March 8, 2022, at 4:00 PM (AST) (the “Objection Deadline”). The Hearing Notice further stated that the request for relief in the Application may be granted and an order entered without a hearing unless a timely Objection was made. According to the *Sixteenth Amended Notice, Case Management and Administrative Procedures* (Docket No. 20190-1) (“Case Management Procedures”), the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection (“CNO”, as defined in the Case Management Procedures).

In accordance with the Case Management Procedures, the undersigned states that he is filing this CNO not less than forty-eight (48) hours after the expiration of the Objection Deadline. The undersigned further certifies that he has reviewed the Court’s docket in this case not less than 48 hours after the Objection Deadline and that no applicable objection, responsive pleading, or request for a hearing with respect to the Application appears on the docket.

WHEREFORE, the undersigned respectfully requests that the Court enter the Proposed Order attached hereto as Exhibit A granting the relief requested in the Application.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY**, that on this same date, a true copy of the foregoing was filed through the Court’s CM/ECF system, which will generate a notice to all CM/ECF participants in this case.

Dated, this 16<sup>th</sup> day of March 2022.

/s/ John Arrastia

John Arrastia, Esq. (*Pro Hac Vice*)  
Jesus M. Suarez, Esq. (*Pro Hac Vice*)  
Angelo M. Castaldi, Esq. (*Pro Hac Vice*)

**CONTINENTAL PLLC**

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*Proposed Special Litigation Counsel to the Official Committee of Unsecured Creditors*

-and-

/s/ Juan J. Casillas Ayala

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*Local Counsel to Official Committee of Unsecured Creditors for all Title III Debtors (other than PBA and COFINA)*